

## **REMARKS**

By this amendment, Applicants have amended claims 1, 6, 12, and 19. As a result, claims 1-20 remain pending in this application. These amendments are being made to facilitate early allowance of the presently claimed subject matter. Applicants do not acquiesce in the correctness of the objections and rejections and reserve the right to pursue the full scope of the subject matter of the original claims, or claims that are potentially broader in scope, in the current and/or a related patent application. Reconsideration in view of the following remarks is respectfully requested.

Applicants' representative requested a telephonic interview with the Office to discuss the Final Office Action of December 11, 2008. The telephone interview was held on February 18, 2009 with Examiner Andy Ho representing the Office and Agent Elaine Chi representing Applicants. During the interview, the rejection of independent claims 1, 6, 12, and 19 in light of Lawson were discussed. No exhibit or demonstration was submitted by Applicants' representative. Applicants' representative explained that in the claims, the selecting feature is "without regard to an event source for the event and without regard to any event consumer for the event" while the Lawson reference provides a global event registry that identifies servers that need notification when an event occurs. That is, the global event registry of Lawson is "a list of events and a corresponding list of servers which need notification when the corresponding event occurs." The Examiner agreed to examine the claims in light of Applicants' representative's arguments.

Further, Applicants' representative explained that Lawson does not provide the plurality of stateless servers. The Examiner indicated that he is uncomfortable with the term "without" in the limitation "without storing state information on the processing."

In the Office Action, the Office rejects claims 6-10, 12-14 and 16 under 35 U.S.C. § 102(b) as allegedly being anticipated by U.S. Patent No. 6,185,613 (Lawson). In order to maintain a proper rejection under 35 U.S.C. § 102(b), the Office must show that a single reference discloses each feature of the claimed inventions. Applicants submit that the Office fails to show that Lawson discloses every feature of the claimed inventions.

With respect to independent claim 6, Applicants assert that Lawson fails to disclose each and every feature of claim 6. For example, Lawson does not disclose, *inter alia*, “wherein every stateless event server does not locally store any state information on a progress of processing the event and any state information is stored in an event data store.” The Office points to Col. 12, lines 19-38 of Lawson and asserts that “no state information [is] being stored during the processing.” See Final Office Action, page 2. However, Applicants contend that simply because the storage of state information is not explicitly disclosed in Lawson does not indicate that Lawson discloses the negative, “wherein every stateless event server does not store any state information.” See claim 6. Further, Applicants contend that Lawson fails to disclose that “state information is stored in an event data store.” *Id.*

Applicants also assert that Lawson fails to disclose “selecting, without regard to the event, the event source, and any event consumer for the event, any one of a plurality of stateless event servers to process the event.” See claim 6. The Office points to Col. 17, lines 22-38 of Lawson to allegedly teach this feature and asserts that Lawson is “selecting a server using remote event processing.” See Final Office Action, page 2. However, in this section, Lawson provides that “the scope of the present invention may, therefore, comprise means for accessing a global event registry to identify which servers should receive which events. ... [R]emote event processing block 65 identifies the servers that should receive events queued in event queue 66 by

checking global registry 68.” See Col. 17, lines 32-38. Lawson further describes global registry 68 as “comprising a list of events and a corresponding list of servers which need notification when the corresponding event occurs.” See Col. 4, lines 55-57. Therefore, Lawson is selecting a server based on whether an event is associated or registered with that particular server. In contrast, claim 6 provides that a server is selected without regard to the event, the event source, or the event consumer for the event.

As a result, Applicants respectfully request withdrawal of the rejections of claim 6 and claims 7-10, which depend therefrom, as allegedly being anticipated by Lawson.

With respect to independent claim 12, Applicants contend that Lawson fails to disclose each and every feature of the claim. More specifically, as for reasons that should be clear in view of the discussion of Lawson above, Applicants assert that Lawson does not disclose “a plurality of stateless event servers, wherein every stateless event server does not locally store any state information on a progress of processing the event and any state information is stored in an event data store, and without regard to the event, event source, and any event consumer for the event.” See claim 12. Accordingly, Applicants respectfully request withdrawal of the rejections of claim 12 and claims 13-18, which depend therefrom, as allegedly being anticipated by Lawson.

Further, the Office rejects claims 1-5, 11, and 19-20 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lawson in view of U.S. Patent No. 7,313,534 (Scheer). Applicants traverse these rejections for the reasons that follow.

With respect to claim 1, the Office fails, *inter alia*, to show that the proposed combination of Lawson and Scheer teaches or suggests selecting, without regard to an event source for the event and without regard to any event consumer for the event, any one of the plurality of stateless event servers to process the event, wherein every stateless event does not

locally store any state information on a progress of processing the event and any state information is stored in an event data store, as in claim 1. For reasons that should be clear in view of the discussion of Lawson above, Applicant contend that Lawson does not teach all the features of claim 1. Further, Applicants submit that the proposed combination of Lawson with Scheer fails to address these deficiencies of Lawson.

As a result, Applicants respectfully request withdrawal of the rejections of claim 1 and claims 2-5, which depend therefrom, as allegedly being unpatentable over Lawson in view of Scheer.

With respect to claim 11, Applicants incorporate the arguments presented above with respect to claim 6, from which claim 11 depends. Further, Applicants submit that the proposed combination of Lawson with Scheer fails to address these deficiencies of Lawson. As a result, Applicants respectfully request withdrawal of the rejection of claim 11 as allegedly being unpatentable over Lawson in view of Scheer.

With respect to independent claim 19, for reasons that should be clear in view of the discussion of Lawson above, Applicants assert that Lawson fails to teach each and every feature of the claim. As a result, Applicants respectfully request withdrawal of the rejection of claim 19 and claim 20, which depends therefrom, as allegedly being anticipated by Lawson.

Further, the Office rejects claims 15 and 17-18 under 35 U.S.C. § 103(a) as allegedly being unpatentable over Lawson in view of U.S. Patent Publication No. 2004/0068568 (Griffin). Applicants incorporate the arguments presented above with respect to claim 12, from which each of these claims depends. Further, Applicants submit that Griffin fails to cure these deficiencies of Lawson. As a result, Applicants respectfully request withdrawal of the rejections of claims 15 and 17-18 as allegedly being unpatentable over Lawson in view of Griffin.

Applicants submit that each of the pending claims is patentable for one or more additional unique features. To this extent, Applicants do not acquiesce to the Office's interpretation of the claimed subject matter or the references used in rejecting the claimed subject matter.

Additionally, Applicants do not acquiesce to the Office's combinations and modifications of the various references or the motives cited for such combinations and modifications. These features and the appropriateness of the Office's combinations and modifications have not been separately addressed herein for brevity. However, Applicants reserve the right to present such arguments in a later response should one be necessary and/or in a related patent application, either of which may seek to obtain protection for claims of a potentially broader scope.

In light of the above, Applicants respectfully submit that all claims are in condition for allowance. Should the Examiner require anything further to place the application in better condition for allowance, the Examiner is invited to contact Applicants' undersigned representative at the number listed below.

Respectfully submitted,

/Elaine Chi/

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